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To: The Federal Communications Commission  
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Gwinnett County Skywarn Member # GWIN-H13  
Amateur Radio Emergency Service Member

Date: 12-MAY-1998  
Re: RM-9267

To the Commission:

It is with great concern that I address the Commission regarding RM-9267. I am an active participant in emergency services made possible in large part by the privileges I have earned as a licensed Amateur Radio Operator. Amateur radio is first and foremost a community service fraternity, and secondarily, a cherished hobby.

The Amateur Radio fraternity has made very significant contributions in the areas of public service since the earliest days of the service. Amateurs typically provide the first reports out of storm-damaged areas, providing damage assessment, health and welfare traffic, and emergency relief effort coordination. The services with which I am affiliated have demonstrated their commitment to public service several times already this year. The tornadoes which devastated parts of Hall, White and Gwinnett counties in recent months provided excellent examples of the need for skilled communicators. In the Hall/White county tornado, amateurs were on the scene immediately, providing much needed first hand information to the county governments and Red Cross Disaster Services.

I was a participant in the Skywarn net on the late evening/early morning of the 8<sup>th</sup> and 9<sup>th</sup> of April, 1998. Our communicators provided instant updates of the progress and direction of the tornadoes which devastated parts of Cobb, Fulton, DeKalb and finally Gwinnett counties before dissipating. The total track length through Gwinnett County was listed as 16 miles, with at least 3000 homes damaged or destroyed by the storm. Many of our dedicated communicators worked nearly around the clock, participating in damage assessment, mass care coordination with the Red Cross, and other activities related to providing relief for those affected by the storms. Gwinnett ARES was involved for a total of (9) days in an official capacity, and many operators participated for 2 weeks or more.

In both the Hall/White and Gwinnett disasters, the Red Cross was able to get damage assessment completed in record time, in large part due to the dedication and proficiency of the individuals I am proud to serve with. The Red Cross celebrated our contributions by hosting an amateur communicator appreciation dinner. It was a delightful time for all involved, and you could feel the excitement in the air as we were honored for our outstanding contributions to the art of disaster relief.

Several members of our Skywarn organization have been approached by members of the public, who stated that they listen to our Skywarn nets in order to get up to the minute reports on the progress of storms in our area. It is very rewarding to know that we are really making a difference in our community. Of course these activities are performed by Amateurs all across our great nation, and for that matter, the world. For these reasons I feel we must protect our Federally allocated radio spectrum.

The 70cm band targeted by the LMCC, is one of the most important bands from an emergency services perspective. This band is widely used by the amateur community, and is one of the lowest frequency bands amateurs may legally perform a much needed function, that of remote repeater receiver linking. The 2-meter band is extremely popular amongst amateurs, and the current rules permit us to operate remote receivers for our 2-meter repeater systems, but only at 1.25-meter frequencies and above. The catch here is that for terrestrial communications, the effectiveness of radio wave propagation falls off dramatically at higher frequencies and the equipment costs increase nearly exponentially. The linking of remote receivers allows amateurs with the most modest equipment to become an effective part of our disaster relief efforts.

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Imagine an amateur being able to communicate across the span of several counties, with nothing more than a low power hand-held radio. This lends a terrific flexibility to our being able to communicate effectively in the time of need. In the case where one or more remote receivers become damaged, the other receivers in the area can usually cover the gap created by the missing link. Amateurs are an enterprising group, and also have means to communicate in the event that the main repeater itself becomes damaged. Station to station, or simplex operation as it is known, provides this critical link to team members when the repeater is disabled.

Radio frequency spectrum is a limited resource, and will continually be scrutinized by commercial interests with the sole purpose of making money. These commercial organizations feel that the amateur service is a thing of the past, and should step aside and let them have it all. The entire spectrum is already allocated, so these corporate giants go searching for services, which in their opinion, are of less value than the ones they are offering.

Above I referred to the 70cm band as one of the lowest bands available for amateur radio remote links. Another band, 1.25-meters (220MHz) is also available. Several years ago the Commission took 2MHz of space in this band for the UPS package tracking system. UPS never did anything of consequence with their new allocation, and this valuable, former amateur band space, is now up for auction. Instead of returning this allocation to the amateur community, the commission decided to sell it to the highest bidder. I hope that this action will not be an indicator as to how future allocation restructuring will be handled.

In my humble opinion, the only real solution is for these companies to invest in spread-spectrum communications, which would allow almost seamless sharing of frequencies with other services. The initial cost will of course be higher, but in the end there will be more apparent spectrum available for everyone.

As a licensed amateur radio operator, I can only hope that the Commission will seek to preserve the amateur service indefinitely. Our proud tradition of community service needs to be retained for the better good of all of the peoples. I also feel compelled to mention the HF bands, which allow worldwide communications. The HF bands are also used for disaster relief coordination, and it is on these bands that the world is typically first alerted to the impact of hurricanes, volcanic eruptions, tsunamis', and other natural disasters. By and large however, it is the VHF and UHF amateur allocations, which are the backbone of local disaster relief systems throughout the world.

The amateur radio service has made, and with the Commissions help, will continue to make, outstanding contributions to the art of radio communications. Fire, police, civil defense, cell phones, business radio systems, and a host of other services owe the very existence of their communications systems to the pioneering efforts of the amateur community. It would be a terrible miscarriage of justice to take away spectrum from the very people who opened it up to the world. At this point in time, some may argue that radio art has progressed to the point that there will, forevermore, be no new discoveries. I wish I had a dollar for every time this ridiculous statement has been made in the past. People have uttered this phrase about almost every field of science and technology imaginable, and still we continue to make progress on all fronts.

Please consider the LMCC proposal carefully, and make the right choice. Amateur radio needs to survive, and our country needs amateur radio to survive and prosper.

Respectfully,

David A. Schulte